

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Manoucheka Charlessaint, individually and
on behalf of the proposed classes,

Plaintiff,

Case No. 1:14-cv-11937-RGS

v.

Persian Acceptance Corp.,

Defendant.

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT AGREEMENT**

Plaintiff moves this Court for preliminary approval of the Class Action Settlement Agreement (“Settlement Agreement” or “Agreement”) attached as Exhibit 1, entered into between the Parties in the above captioned proceeding.

In support of her request, Plaintiff asserts that the proposed Settlement Agreement is fair and reasonable and is consistent with the provisions of Rule 23. Defendant assents to the relief sought in this motion. In further support of the motion, Plaintiff refers the Court to Plaintiff’s Memorandum in Support of Unopposed Motion for Preliminary Approval of Settlement Agreement, submitted herewith. A proposed form of Order is attached to the Settlement Agreement as Exhibit A.

The Parties request that the Court set a hearing date for Final Approval of the Settlement (“Fairness Hearing”) on a date and time that will permit compliance with with CAFA, 28 U.S.C. § 1715. Having checked their respective schedules, the Parties jointly request that the Fairness Hearing be set on any of the following dates: February 23, February 24 or March 8, 2015.

Plaintiff also requests that the Court order that:

(i) Requests for Exclusion be postmarked no later than **30 days** after the mailing of the Notices;

(ii) Objections, if any, be filed and served no later than **30 days** after the mailing of the Notices;

(iii) Submissions by the parties related to final approval, including memoranda in support of the proposed Settlement, responses to objections, and petitions for attorneys' counsel fees and reimbursement of costs and expenses be filed no later than **10 days** prior to the Final Approval Hearing.

Plaintiff proposes the following dates as deadlines:

Deadline for mailing notice: _____, 2015
[45 days from date of
Preliminary Approval Order]

Deadline for Exclusions and Objections: _____, 2015
[30 days after mailing of
Notice]

Deadline for filing motion for final approval,
responses to objections and requests for
attorneys' fees and costs: _____, 2015
[10 days prior to Fairness
Hearing]

Date of Fairness Hearing: _____, 2015

WHEREFORE, Plaintiff requests that this Court grant this motion and enter the Proposed Order attached to the Settlement Agreement as Exhibit A, preliminarily approving the Settlement Agreement and the Notice attached as Exhibit B to the Settlement Agreement, certifying the Settlement Class for purposes of settlement, and set a hearing to consider final approval of the Settlement Agreement.

Dated: October 15, 2015

Respectfully submitted,

/s/ Charles M. Delbaum

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*Counsel for Plaintiff, Manoucheka
Charlessaint*

Certification Pursuant To Local Rule 7.1

Pursuant to Local Rule 7.1, undersigned counsel for Plaintiff certifies that he conferred with counsel for Defendants in regard to this motion and Defendants do not oppose the relief requested in the motion.

/s/ Charles M. Delbaum
Charles M. Delbaum

Certificate Of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF) on _____, 2015.

/s/ Charles M. Delbaum
Charles M. Delbaum